



Howard A. Matalon, Esq.  
908-964-2424  
hmatalon@olenderfeldman.com  
Please respond to New Jersey address

November 14, 2023

**VIA CM/ECF**

The Honorable Evelyn Padin, U.S.D.J.  
United States District Court, District of New Jersey  
Martin Luther King Jr. Courthouse  
50 Walnut Street, Courtroom MLK 4C  
Newark, New Jersey 07101

**SO ORDERED**

*s/James B. Clark*

**James B. Clark, U.S.M.J.**

**Date:** 11/15/2023

**RE: J.P. v. Strategic Delivery Solutions, et al.  
Civil Action No. 22-CV-07614**

Dear Judge Padin,

This office represents Defendants Strategy Delivery Solutions, LLC (“SDS”), David Kronick, Andrew Kronick, and Mike Ruccio (collectively “Defendants”). We are writing to respectfully request the Court’s permission to file a sur-reply with respect to Plaintiff J.P.’s (“Plaintiff”) pending motions to seal and file anonymously.

In accordance with Local Civil Rule 7.1(d)(6), Defendants’ proposed sur-reply is attached hereto as **Exhibit A**. Defendants’ request to file a sur-reply should be granted because Defendants have recently acquired evidence that contradicts Plaintiff’s representations regarding the privacy and confidentiality of his medical condition and diagnosis which he seeks to withhold by way of his pending motions. Plaintiff represented to the Court that such information is private and that he has undertaken to maintain their confidentiality. As shown in the attached **Exhibit A**, these representations are entirely false. As officers of this Court, we are duty bound to ensure the Court has true and accurate information to render a decision.

Contrary to Plaintiff’s representations, Plaintiff’s diagnosis and medical conditions are the subject of numerous public cases filed by Plaintiff, which are included in publicly-filed documents. See **Exhibits A-1, A-2**. For these reasons, as set forth in more detail in **Exhibit A**, Plaintiff’s motions must be denied. Plaintiff should also show cause why sanctions should not be entered by this Court under Rule 11 of the Federal Rules of Civil Procedure for his clear attempt to perpetrate a fraud on this court.

We thank the Court for its consideration in this regard.

Respectfully submitted,

*/s/ Howard A. Matalon*  
Howard A. Matalon, Esq.

Enclosure  
cc: J.P. (via ECF)

**New Jersey**  
422 Morris Avenue  
Summit, New Jersey 07901

**New York**  
1180 Avenue of the Americas, 8<sup>th</sup> Floor  
New York, New York 10036

olenderfeldman.com  
fax: 908-810-6631